

**AFFIDAVIT OF THOMAS R. BREEDEN IN**  
**SUPPORT OF HIS MOTION TO APPEAR PRO HAC VICE**  
**IN THE SOUTHERN DISTRICT OF NEW YORK DISTRICT COURT**

I, Thomas R. Breeden, under penalties of perjury hereby declare and state:


1. I have never been convicted of a felony;
2. I have never been suspended, disbarred an/or denied admission or readmission by any court. I was reprimanded by the Virginia State Bar in 2010 for failing to supervise an associate attorney. The associate attorney had filed a Fair Debt Collection Practices Act claim, and failed to timely respond to a Motion to Dismiss and failed to otherwise argue in support of the claim. As a result, the associate, the firm and the client were sanctioned by the Court in the amount of \$16,000.00. Upon learning of this, I paid the sanctions to ensure that the client was not adversely affected by the associate's negligence.
3. There are no disciplinary proceedings presently against me.

Dated: 1/17/2023

  
\_\_\_\_\_  
Thomas R. Breeden

COMMONWEALTH OF VIRGINIA;  
COUNTY OF PRINCE WILLIAM; to wit:

Subscribed and sworn to before me in my aforesaid jurisdiction by Thomas R. Breeden on  
this 17th day of January, 2023.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 1/31/2025

KATHRYN PINSON OUTLAND  
NOTARY PUBLIC  
REGISTRATION # 359380  
COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES  
JANUARY 31, 2025